

APPENDIX D

OPEN ISSUES

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This appendix documents the Project EASI/ED issues that are still open. This information is maintained in the Project EASI/ED Issues database and contains the following information: the name of the issue, the description of the issue, and the date the issue was opened.

Issue Name: Master promissory note processing

Issue Desc: Is a hardcopy master p-note required for legal reasons? Exactly when does the student first sign the master p-note? Do the lenders need to see an image of the note? At what point will a signature be required? How does it roll over from year to year?

Open Date: 4/3/97

Issue Name: Legal issues for release of EFT and student payment information

Issue Desc: Do legal issues arise when EASI provides student and bank EFT information to facilitate loan repayment?

Open Date: 4/3/97

Issue Name: Legal, policy, and operational issues around collecting information on all students

Issue Desc: Resolve the legal, policy, and operational issues of collecting enrollment information on ALL students versus collecting information only on students applying for aid.

Request to consolidate with issue 138. Information below.

Regarding enrollment reporting: There was a lengthy discussion regarding whether ED could or should collect enrollment data on all enrolled students, not just Title IV aid recipients. Brian Fitzgerald stated that ED could receive the information, but would not have to retain the information on non-federal aid recipients. He believed that this would avert any concerns regarding the appropriateness of ED gathering the data. Other members of the Steering Committee suggested that it would be better to use a third party to gather enrollment data, averting the issue altogether. The question of the best and most correct approach to this remained open. This issue was raised at the 7/24/97 Project EASI Steering Committee Meeting.

Discussions between ED, the Project EASI steering committee, and the National Student Loan Clearinghouse are currently underway to define how ED should interact with the Clearinghouse and what impact this may have on the implementation to the Project EASI/ED full enrollment information requirement. This issue cannot be resolved until these discussions come to a conclusion.

Open Date: 4/3/97

Issue Name: Legal and privacy issues of enrollment status distribution

Issue Desc: What legal and privacy issues arise if participants and schools must report their enrollment status and others are provided read access?

Open Date: 4/3/97

Issue Name: Differing IRS confirmation information

Issue Desc: A participant should be able to self-certify for determination of repayment options instead of waiting for the IRS confirmation on income-contingent loans. What happens if the IRS confirmation differs from what the student reported? This issue was raised at the 4/17/97 Technical Review.

Open Date: 4/23/97

Issue Name: Legality of multi-year promissory note

Issue Desc: Is the multi-year promissory note a legally enforceable document? What statutory language is required in order to implement it?

Open Date: 4/24/97

Issue Name: Reconciliation between EASI and schools.

Issue Desc: We must determine exactly what tpe of reconciliation process is necessary between EASI and schools.

Open Date: 5/8/97

Issue Name: Release of student information to “fly-by-night” organizations

Issue Desc: Regarding release of eligibility data/interest in receiving other aid to private scholarship organizations: How will the Department of Education (ED) qualify private scholarship organizations for receipt of this data to ensure that fly-by-night organizations are not given access to student information? This issue was raised at 7/24/97 Project EASI Steering Committee Meeting.

Open Date: 9/23/97

Issue Name: Internal Motivational Awards

Issue Desc: How can we reward/acknowledge development in ED as being a positive demonstration of the Project EASI vision. Suggestions include: delivering an award in front of their peers, presenting their work and introducing them to the steering committee.

Open Date: 1/28/98

Issue Name: Anticipated graduation date

Issue Desc: Currently, a student's anticipated graduation date is used for enrollment tracking purposes. Is this an appropriate way to help track enrollment status?

Open Date: 2/10/98

Issue Name: Campus-based reallocation process – rollover of funds

Issue Desc: Examine Campus-Based Reallocation Process to ascertain the practicality of increasing the rollover of Campus-Based funds from one year to two years.

Open Date: 2/11/98

Issue Name: Information Sharing Agreements – Income Verification/Eligibility

Issue Desc: Project EASI Core Team will discuss the requirements associated with income verification/eligibility determination in the context of an future information sharing agreements with IRS, HHS, and the VA.

Open Date: 3/9/98

Issue Name: FAFSA and MYP

Issue Desc: Should the FAFSA include the MYP?

Open Date: 5/13/98

Issue Name: Imaging MYP

Issue Desc: Should all data on MYP be stored in a database? Or is image sufficient? Since ratio of usage of this data to storage costs is very low, it may not need to be in the database.

Do the lenders need to see an image of the note? Holders of loans will need access to note for enforcement. State law may vary; issue to explored further. Fred Sellers responded by saying yes, the lender will need to see an image of the MYP note. The lender may in fact need to have the original note signed by the participant. Many design/legal questions are associated with this issue.

Open Date: 5/13/98

Issue Name: Funds Disbursement

Issue Desc: Can a school disburse funds prior to receiving authorization from the student? What is the impact to the school, student, EASI/ED.

Open Date: 5/13/98

Issue Name: Creation of a participant

Issue Desc: When should a participant ID be created in the target system?

Open Date: 5/13/98
